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Review of Chemical Management Program Description Document

A L Schubert, Director Waste Programs EG&G Rocky Flats, Inc

We have reviewed the Chemical Management Program Description Document and are providing our comments in the attached Review Comment Record Forms We look forward to seeing your disposition of these comments and review of the final draft of this document

If you have any questions, please call me at extension 4561 or Paul Cote at extension 3334

Thomas Lukow, Director

Waste Programs Division

Attachment

cc w/Attachment
J Wienand, WPD, RFO
T Hedahl, EG&G

CORRES CONTROL X X PATS/T130G

Adm Rec. X X

Reviewed for Addressee Corres Control RFP

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RF-46522 (Rev 7/93)

AMEM Form 91-01 Rev 4, 08/31/93

ROCKY FLATS OFFICE AMFO REVIEW OF TECHNICAL DOCUMENTS REVIEW COMMENT RECORD

Document	Reviewed (T	Title, Numbe	ate, etc)	Reviewer Mario Acevedo		Agreement with Dispositions	
RFP Chem	RFP Chemical Manageme Document Draft 8/23/93	ment Progra 33	RFP Chemical Management Program Description Sig	Signature	<u> </u>	Date	
	. 10210 tames	3	Da	Date 9/14/93 Phone 6498	<u> </u>	Reviewer	
			Or	Organization WPD, SMS		Document Preparer	
*Comment Type		Essential (a	E = Essential (agreement must be document	ted for other than verbatum incorp	oration), S	imented for other than verbatim incorporation), S = Suggested, Non-C = Nonconcurrence	
Comment No	Comment Type*	Para No	20	Comment		Disposition	
	Non C	Overall	This document provides in chemical management wit procedures are published take place. What is need	This document provides much detailed instruction about chemical management with the assumption that because procedures are published that the actions so specified do take place. What is needed is enforcement of these			
			instructions to ensure that executed For example, Hygiene and Safety is dire	instructions to ensure that these procedures are indeed executed. For example, Section 5.1.6.3, Industrial Hygiene and Safety is directed to distribute MSDSs in a			
			timely manner when the ac MSDSs is backlogged and RFP have to seek MSDSs or	timely manner when the actuality is that IH's request for MSDSs is backlogged and some of the organizations at RFP have to seek MSDSs on their own			
2	S	4 2	Receiving/Distribution P inventory or apply barcod which are the majority of	Receiving/Distribution Process Warehouse does not inventory or apply barcode labels to Systems Contracts which are the majority of packages that arrive at RFP			
			Warehouse takes the presponsibility to ensure the inventoried and barcode	Warehouse takes the position that it is the user's responsibility to ensure that all chemicals are properly inventoried and barcoded if necessary Additionally,			****
			Warehouse does not apple Contract packages even chemicals	Warehouse does not apply a CCS sticker to Systems Contract packages even if such packages do contain chemicals			···
3	S	51221	Change reference from "Chemi read "Chemical Control System"	Change reference from "Chemical Tracking System" to read "Chemical Control System"			
4	S	5137	The supervisor is to con hazardous chemical in the	The supervisor is to confirm that MSDSs for every hazardous chemical in the work area are readily available			
			but does not specify how appropriate MSDS Industrian MSDS but this is not alway	but does not specify how the supervisor should get the appropriate MSDS Industrial Hygiene should provide the MSDS but this is not always the case (See comment 1)			

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UFP Chemical Management Program Description Document, Draft, 8/23/93	Comment	
FP Chemical	Para No	
124	Comment Comment	Type*
Document Reviewed	Comment	No

Disposition

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	5 1 4 4 Drivers need to have immediate access to MSDSs of	chemicals transported for emergency purposes No	included of this requirement has been included	Chemical Tracking and Control Systems Group should be	included in the Chemical Management Steering Committee	Who is responsible for monitoring the expiration date of	chemicals? The user, the Chemical Tracking Specialist, the	Chemical Control Officer?
	5144			6321		959		
3761	S			S		S		
22.	5			9		7		

AMEM Form 91-01 Rev 4, 08/31/93

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ROCKY FLATS OFFICE AMFO REVIEW OF TECHNICAL DOCUMENTS REVIEW COMMENT RECORD

Document Revie	wed (Title, Numb	Document Reviewed (Title, Number, Revision, Date, etc.)	Reviewer CA Thompson	A	Agreement with Dispositions
RFP Chemical M Document	RFP Chemical Management Program Description Document	am Description	Signature	ä	Date
Draft, 8-23-93, Rev 0	Rev 0		Date 9/13/93 Phone 6490	R	Reviewer
			Organization WPD (SMS)	D	Document Preparer
*Comment Type		agreement must be docum	nented for other than verbatum incorp	oration), S =	E = Essential (agreement must be documented for other than verbatim incorporation), S = Suggested, Non-C = Nonconcurrence
tonness ton	Comment Pera No		Christia		Бізролію,
Z	Non C Overall	The purpose for this document is unclea (90%) provides information that can be f EG&G management plans, policies, and prexample nearly 11 pages of "respons unnecessary, especially considering that organizational responsibilities describes provided the section are described else document. Another example the long release reporting in section 6 8 is redundar sections in the HWRM and other documents.	The purpose for this document is unclear Most of it (90%) provides information that can be found in other EG&G management plans, policies, and procedures. For example nearly 11 pages of "responsibilities" are unnecessary, especially considering that many of the organizational responsibilities described in the Responsibilities section are described elsewhere in this document. Another example, the long discussion of release reporting in section 6.8 is redundant with similar sections in the HWRM and other documents.		
		Much of the information of value to the user F Outputs, specifically reader nothing. It does Building Manager shochemical/waste disposition of dispositioning beg Building Manager T "program," because the implement. What a Management program?	Much of the information is vague, and therefore of little or no value to the user. For example, Section 67, Process Outputs, specifically section 674, "Waste," tells the reader nothing. It doesn't provide schedules whereby a Building Manager should inspect his/her building for chemical/waste dispositioning. It merely says "the process of dispositioning begins." This means nothing to a Building Manager. These words do not implement a "program," because there are no real program elements to implement. What are the goals for the Chemical Management program? What are the plans to attain those goals? What is the current status of the program?		

	Dapportun								
		brief description of the other procedures that implement the overall Chemical Management Program, along with the "tasks" needed for full implementation	Definition "segregate" also include 'radioactive/ nonradioactive' as items should be segregated in this	No decision point is provided for excess chemical list review prior to procuring new chemicals	The flow chart describes "Warehouse/Receiving personnel apply CCS Chemical Container Barcode label This does not happen consistently, especially for chemicals purchased on a systems contract, making this statement misleading	"Chemical Tracking Specialists Checks Dock Daily for New Chemical Shipments" This does not happen for every building Suggest you check with CT&CS for more realistic picture. Also, no mention is made in receiving/distribution flow chart of what happens with bulk	Excess/Waste Chemical Dispositioning Activities Flow Chart Rad waste determination missing on this flow-chart	"a database called the Chemical Tracking System" is incorrect. It's called the 'Chemical Control System' 1-25500-HSP 9 12 Timplements:	Tracking Process is referenced throughout this document, but does not appear in Section 7 0, "References" Where is the discussion of product tanks? One "note" on page 47 was the only mention of tanker delivenes
	P 70		Page 11	4 I	4 2	4.2	4.7	51221	General
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